

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

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In re: **MARIA CARMEN BELTRAN,**  
  
Debtor(s).

Chapter 13  
  
Case No. 17-28364-KMP

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**NOTICE AND REQUEST TO MODIFY CONFIRMED CHAPTER 13 PLAN**

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Maria C. Beltran has filed papers with the court requesting modification of the confirmed Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for a hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk of Bankruptcy Court  
517 E. Wisconsin Avenue, Room 126  
Milwaukee, WI 53202-4581

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Attorney Paul Strouse  
**d/b/a Strouse Law Offices**  
413 N. 2<sup>nd</sup> Street, Suite 150  
Milwaukee, WI 53203

If you or your attorney do not take these steps, the court may decide that you do not oppose the

Address  
413 N. 2<sup>nd</sup> Street., Suite 150  
Milwaukee, WI 53203  
Telephone: (414) 390-0820  
Fax: (414) 220-5115  
strouselawoffices@gmail.com

request and may enter an order modifying the Plan

### REQUEST TO MODIFY CONFIRMED CHAPTER 13 PLAN

1. The person requesting this plan modification is:  
X the Debtor;  
\_\_\_\_ the Chapter 13 Trustee;  
\_\_\_\_ the holder of an unsecured claim, Name: \_\_\_\_\_
2. Service. A certificate of service must be filed with this request for plan modification.  
Designate one of the following:  
A. X A copy of this proposed modification has been served on the parties, (the debtor, the trustee, the United States trustee and all creditors) as required by Fed. R. Bank P. 3015(g); or  
B. \_\_\_\_ A motion requesting limited service is being filed simultaneously with the Court.
3. I request the following modification of the Chapter 13 Plan last confirmed by the Court:  
A. **Unsecured Creditors: The debtor is amending her plan in order to pay into the plan one-half of her net income tax refunds for 2019, which is \$199.50. Therefore, the debtor is amending her plan so that, after all other classes have been paid, she will pay creditors with allowed general unsecured claims to a pro rata share of not less than \$199.50.**

All remaining terms of the original Chapter 13 Plan confirmed on December 21, 2017 are unaffected. In the event of a conflict between the terms of the confirmed Plan and the terms of this modification, the terms of this modification control.

WHEREFORE, the proponent requests that the Court approve this modification to the confirmed Chapter 13 Plan.

### CERTIFICATION

Each proponent of the attorney for each proponent must sign this certification. If the proponent is the Debtor, the Debtor's attorney must sign this certification, and the Debtor may, but is not required to sign. If the Debtor does not have an attorney, the Debtor must sign this

certification.

**The provisions in this modified Chapter 13 plan are identical to those contained in the official local form other than the changes listed in part 3.**

I certify under penalty of perjury that the foregoing is true and correct.

Respectfully submitted October 18th, 2020.

Strouse Law  
Attorneys for Debtor

By: /s/Paul A. Strouse  
Attorney Paul A. Strouse  
Bar No. 1017891

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